

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

LEAGUE OF WOMEN VOTERS OF OHIO
AND JENNIFER KUCERA,

Plaintiffs,

v.

FRANK LAROSE, in his official capacity as
Ohio Secretary of State; DAVID YOST, in his
official capacity as Attorney General of Ohio;
MICHAEL O'MALLEY, in his official
capacity as County Prosecutor of Cuyahoga
County;

Defendants.

Civil Action No. 1:23-cv-02414

Judge Bridget Meehan Brennan

Magistrate Judge Jonathan D. Greenberg

**MOTION TO INTERVENE OF THE REPUBLICAN NATIONAL COMMITTEE
AND THE OHIO REPUBLICAN PARTY**

The Republican National Committee and the Ohio Republican Party move for leave to intervene as party defendants pursuant to Federal Rule of Civil Procedure 24. Intervention is warranted for the reasons set forth in the accompanying memorandum in support. Intervenors attach as **Exhibit 1** the Answer and Affirmative Defenses they would file if permitted to intervene.

Counsel for the Proposed Intervenors contacted counsel for Plaintiffs and counsel for Defendants prior to filing this motion. Plaintiffs take no position on this motion. Defendants Secretary LaRose and Attorney General Yost have no objection to intervention. Defendant O'Malley did not provide a position on this motion prior to filing.

Dated: January 19, 2023

Respectfully submitted,

/s/ Jesse T. Wynn

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**Pro hac vice application forthcoming*

CERTIFICATE OF SERVICE

I certify that on January 19, 2024 a copy of the foregoing Motion to Intervene was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ Jesse T. Wynn
Jesse T. Wynn
Attorney for Proposed Intervenor-Defendants

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[PROPOSED] ORDER

AND NOW, this ____ day of _____, 2024, upon consideration of the Motion to Intervene of the Republican National Committee and the Ohio Republican Party, it is hereby ORDERED, ADJUDGED, and DECREED that the Motion is GRANTED. The clerk is direct to file on the docket Intervenors' Motion to Dismiss.

Honorable Bridget Meehan Brennan
United States District Judge